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7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE DISTRICT OF NEVADA

10 CELESTIAL CAMPBELL, an individual,
Plaintiff,

11 vs.

12 TARGET CORPORATION; DOE EMPLOYEES
13 OF TARGET CORPORATION; DOES 1-20 and
14 ROE BUSINESS ENTITIES 1-20, inclusive,

15 Defendant's

CASE NO: 2:24-cv-00655-RFB-EJY

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(THIRD REQUEST)**

16 Pursuant to Fed. R. Civ. P. 6, Fed. R. Civ. P. 26, LR 26-1 and LR 26-4, Plaintiff, CELESTIAL
17 CAMPBELL ("Plaintiff"), by and through her attorney of record, ALISON M. BRASIER, ESQ. of
18 the law firm HICKS & BRASIER, PLLC and Defendant, TARGET CORPORATION, by and through
19 its attorneys of record, LOREN S. YOUNG, ESQ. and JULIE A. WHITE, ESQ. of the law firm
20 LINCOLN, GUSTAFSON & CERCOS, LLP, and hereby stipulate and agree to a sixty (60) day
21 continuance of the current discovery deadlines to give the parties additional time to conduct discovery
22 and discuss possible resolution.

23 **I. DISCOVERY COMPLETED**

- 24 1. Plaintiff, CELESTIAL CAMPBELL served her FRCP 26(a)(1) Initial List of Witnesses
25 and Documents on April 22, 2024.
- 26 2. Defendant, TARGET CORPORATION served its FRCP 26(a)(1) Initial List of
27 Witnesses and Documents on April 23, 2024.
- 28

- 1 3. Defendant, TARGET CORPORATION propounded its First Set of Interrogatories,
2 Requests for Admissions, and Requests for Production of Documents to Plaintiff on May
3 24, 2024.
- 4 4. Plaintiff, CELESTIAL CAMPBELL served her responses to Defendant's First Set of
5 Requests for Admissions on June 11, 2024.
- 6 5. Plaintiff, CELESTIAL CAMPBELL served her First Supplemental Disclosure on June
7 20, 2024.
- 8 6. Plaintiff, CELESTIAL CAMPBELL served her responses to Defendant's First Set of
9 Requests for Production of Documents on June 20, 2024.
- 10 7. Plaintiff, CELESTIAL CAMPBELL served her responses to Defendant's First Set of
11 Interrogatories on June 28, 2024
- 12 8. Defendant, TARGET CORPORATION served its First Supplemental Disclosure on July
13 10, 2024.
- 14 9. Plaintiff, CELESTIAL CAMPBELL propounded her First Set of Interrogatories and
15 Requests for Production of Documents to Defendant on August 6, 2024.
- 16 10. Defendant, TARGET CORPORATION propounded its Second Set of Interrogatories,
17 Requests for Admissions, and Requests for Production of Documents to Plaintiff on
18 September 11, 2024.
- 19 11. Plaintiff, CELESTIAL CAMPBELL served her Initial Expert Disclosure on September
20 20, 2024.
- 21 12. Defendant, TARGET CORPORATION served its Second Supplemental Disclosure on
22 September 20, 2024.
- 23 13. Defendant served its responses to Plaintiff CELESTIAL CAMPBELL's First Set of
24 Interrogatories and Requests for Production of Documents on September 20, 2024.
- 25 14. Plaintiff, CELESTIAL CAMPBELL served her responses to Defendant's Second Set of
26 Interrogatories, Requests for Admissions, and Request for Production of Documents on
27 September 25, 2024.
- 28

15. Plaintiff, CELESTIAL CAMPBELL served her First Supplemental Designation of Initial Experts disclosure on October 2, 2024.
16. Defendant, TARGET CORPORATION served its Third Supplemental Disclosure on November 4, 2024.
17. Plaintiff, CELESTIAL CAMPBELL served her Second Supplemental Disclosure on November 21, 2024.
18. Plaintiff, CELESTIAL CAMPBELL served her First Amended Responses to Defendant's Second Set of Requests for Admissions on December 20, 2024.
19. Defendant, TARGET CORPORATION served its Fourth Supplemental Disclosure on December 31, 2024.
20. Plaintiff, CELESTIAL CAMPBELL served her Rebuttal Expert Disclosure on January 6, 2025.
21. Defendant, TARGET CORPORATION served its Initial Expert Disclosure on February 18, 2025.
22. Plaintiff, CELESTIAL CAMPBELL served her Third Supplemental Disclosure on March 17, 2025.
23. The deposition of Plaintiff, CELESTIAL CAMPBELL was taken on March 28, 2025.

II. DISCOVERY REMAINING TO BE COMPLETED

1. Depositions of percipient witness
2. Depositions of FRCP 30(b)(6) witnesses
3. Expert witness depositions
4. Additional written discovery as needed

III. REASONS WHY DISCOVERY SHOULD BE EXTENDED

The parties have been working together to schedule the depositions of Plaintiff's husband, mother, and friend who she spoke to after the subject incident, as well as the Target 30(b)(6) deposition. In addition to scheduling the aforementioned depositions, the parties have recently identified new lead counsel for the matter. The change of lead counsel for each party has required time

to review the case and coordinate additional depositions and discovery items which has been challenging under the current discovery period.

PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY

It is hereby stipulated that the discovery cutoff deadline be extended for a period of sixty (60) days. If approved, the new discovery deadlines would be modified as follows:

EVENT DEADLINE	CURRENT DATE	PROPOSED DATE
Close of Discovery	05/19/25	07/18/25
Motions to Amend Pleadings	10/18/24	Closed
Initial Expert Disclosures	02/18/25	Closed
Rebuttal Expert Disclosures	03/19/25	Closed
Dispositive Motions	06/18/25	08/18/25 ¹
Joint Pre-Trial Order	07/17/25	09/17/25

IT IS SO STIPULATED AND AGREED.

DATED this 23rd day of April, 2025.

DATED this 23rd day of April, 2025.

LINCOLN, GUSTAFSON & CERCOS, LLP HICKS & BRAISER, PLLC

/s/ Loren S. Young

/s/ Alison M. Braiser

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Attorneys of Plaintiff,

CELESTIAL CAMPBELL

ORDER

IT IS SO ORDERED.


United States Magistrate Judge

Date: April 23, 2025

¹ Actual date is 08/17/25, which is a Sunday.